BAKER & HOSTETLER LLP ATTORNEYS AT LAW SAN FRANCISCO

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I, ELIZABETH "LIBBY" ANDRESEN, pursuant to 28 U.S.C. § 1746, declare as follows:

- 1. Until November 8, 2018, I lived in Paradise, California, in a single-family home with my mother, brother, nephew, son, and daughter-in-law.
- At approximately 7:30 a.m. on November 8, 2018, without any warning, flaming embers began dropping from the sky onto our two-acre property, setting off ground fires on impact. Within moments, a tornado-like wind, filled with burning embers, ripped through the property, setting the ground and trees on fire.
- 3. I ran back into the house, rounded up the family and pets, and jumped into a car with my son, daughter in-law, and four of our pets. My brother loaded our 85-year-old mother into his car (along with our two other pets) and evacuated alongside us.
- Shortly after we evacuated, our home—along with almost everyone else's in 4. Paradise—burned the ground.
  - 5. Since that day, my life has been a living hell.
- It began with me spending 32 days in a shelter taking care of my 85-year old 6. mother and eleven other seniors who contracted norovirus while in the shelter and sharing a single working toilet. I can only describe this experience as a complete loss of human dignity for my mother and the other senior citizens. (I, too, ended up contracting norovirus in the shelter.)
- After the shelter, my mother and I moved into an RV at the Silver Dollar 7. Fairgrounds. It was there that we learned that my mother has terminal cancer in her pancreas, colon, spleen, kidney, and lung. So she had to go through several procedures, including biopsies, while we were sharing a leaky, dilapidated, rat-infested motor home in the middle of a hastilyconstructed refugee camp.
- My mother and I are now living in a HUD housing in Chico, which is all that we can afford. Because it's an upstairs unit without an elevator, my mother-who struggles to walk and puts herself in serious danger every time she has to go up or down stairs—is only able to leave the house for her medical appointments.
- Like most of the other fire victims I know, we desperately need emergency 9. financial assistance.

- 10. For one thing, we need to be able to afford to rent a ground-level apartment, so that I can more easily get my mother to her appointments and so that my mother doesn't have to risk falling every time she leaves the house.
- 11. We also need to purchase all sorts of medical equipment for my mother that we cannot currently afford, like prescription glasses (which burned in fire, and which Medicare won't cover), a wheelchair, a walker, a shower chair, a commode, and adult diapers.
- 12. We also need to purchase a car that I can easily assist my mother getting into and out of. (Our regular car burned in the fire, and while we were recently fortunate enough to be gifted a truck, it's a completely impractical, 1-ton diesel-engine behemoth that I struggle mightily to load my mother into and out of.)
- 13. I also need to purchase business supplies so that I can start working again. (Before the fire, I owned and operated a residential and commercial cleaning business, and I plan to restart that business as soon as I can afford the necessary supplies.)
- 14. I understand it may be a long time before we recover everything that we are owed. But in the meantime, if we receive at least some emergency financial assistance, we'll be able to start putting at least some pieces of our life back together.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 29, 2019, at Chico, California.

Eliza beth "Elivoy" Andresen

DECL. OF ELIZABETH "LIBBY" ANDRESEN

CASE NO. 19-BK-30088 (DM)

-30088 Doc#

Filed: 05/15/19

Entered: 05/15/19 15:59:18

Case: 1

I, LANDON ANDRESEN, pursuant to 28 U.S.C. § 1746, declare as follows:

- 1. On November 8, 2018, I was living in Paradise, California, with my mother, my grandmother, my uncle, my cousin, and my wife, Estefania, who was then eight and a half months pregnant.
- 2. At approximately 7:30 a.m. on November 8, 2018, without any warning, flaming embers began dropping from the sky onto our two-acre property, setting off ground fires on impact. Within moments, a tornado-like wind, filled with burning embers, ripped through the property, setting the ground and trees on fire.
- 3. I called 911 for help, but the operator told me all of Paradise was on fire and that I had to "get out of Paradise now." There was not going to be any help on the way. I immediately ran back to the house to warn my family, grabbed our most vital papers, and with my mother, pregnant wife, and four pets jumped into a car to evacuate. My uncle, along with my 85-year old grandmother and other two pets, evacuated in a second car.
- 4. Shortly after we evacuated, our home—along with almost everyone else's in Paradise—burned to the ground.
- 5. We found a pet-friendly shelter (a converted church gymnasium) where we could stay, but because the smoke was so thick and norovirus had spread throughout the shelter, I had to move with my pregnant wife (who was due in two weeks) to the pastor's office in a separate area.
- 6. At the shelter, my wife went into labor. We took her to Enloe Medical Center, where our beautiful daughter was born.

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- 7. Because there was no way we could bring our daughter back to the shelter, where norovirus was still spreading and people were deathly ill, a very kind family gifted us free rent in an apartment for 6 months. The apartment is in Sacramento, more than two hours away from my family, but I had to do what was best for my wife and daughter.
- 8. So on the day that my wife and daughter left the hospital, we moved to Sacramento without our family or any financial help.
- 9. It is now almost six months later, and our apartment will no longer be free starting next month. We're not going to be able to afford to live in this apartment for very long. While I was able to find a job at a lumber yard (my old job was lost due to the fire), the pay is not enough to afford the home and also care for our daughter, who is now five months old. The apartment costs three times more than the rent we paid in Paradise.
- 10. Because our baby is still nursing and unable to go to day care, my wife must stay home to care for her full-time, and so she cannot work.
- 11. To add to our struggle, when we tried to visit our family for Easter, we were in a car accident and totaled our Volvo. We now have only one car, which I must use to get to the lumber yard. My wife has no car she can use while caring for our baby.
- 12. Now, our money is running out and we don't know what we're going to do next month, since we won't be able to afford rent once our lease is up. All of the money we have is put towards caring for our five-month-old baby, and there is simply not enough money to get by as new parents.
- 13. I understand it may be a long time before we recover everything that we are owed. But in the meantime, if we receive at least some immediate financial assistance, we'll be able to start putting at least some pieces of our life back together.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 29, 2019, at Sacramento, California.

K

Landon Andresen

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Case:

I, PAUL ANDRESEN, pursuant to 28 U.S.C. § 1746, declare as follows:

- Until November 8, 2018, I lived in Paradise, California, in a single-family home with my mother, sister, son, nephew, and nephew's wife.
- At approximately 7:30 a.m. on November 8, 2018, without any warning, flaming embers began dropping from the sky onto our two-acre property, setting off ground fires on impact. Within moments, a tornado-like wind, filled with burning embers, ripped through the property, setting the ground and trees on fire.
- 3. We all evacuated immediately—me with our 85-year-old mother and two of our pets in one car, and the rest of the family (except my son, who was in Oroville) in another.
- 4. Shortly after we evacuated, our home—along with almost everyone else's in Paradise—burned the ground.
- 5. After spending a month living in a tent at a shelter, and then two months at the Silver Dollar Fairgrounds, I'm now living with my son Brandon in a 27-foot trailer in Chico. We are struggling to make ends meet.
- I'm a general contractor and home inspector by trade, and I lost a lifetime's worth 6. of tools—approximately \$50,000 worth—in the Camp Fire. Because most of my work was in the Paradise area, I also lost essentially my entire clientele.
- I'm now trying to get back into business, but can't afford to buy a whole new set of 7. tools for contracting work, and am struggling to generate home inspection business in Chico.
- My son, who is a full-time college student at Butte College, also lost all his 8. belongings-including his laptop and college textbooks-in the fire, and we aren't able to afford to replace everything he lost.
- I understand it may be a long time before we recover everything that we are owed. 10. But in the meantime, if we receive at least some emergency financial assistance, we'll be able to start putting at least some pieces of our life back together.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 29, 2019, at Chico, California. Paul Andresen 

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# **DECLARATION OF Tracy Lynne Ambrister**

 Tracy Lynne Arnbrister, make this declaration based upon my personal knowledge. I am over the age of 18, am competent to testify, and do so as follows:

At the time of the North Bay Fires I lived in Santa Rosa, CA. My primary and only residence was destroyed in the fire. I lost my home and all of my possessions. And I had no insurance.

Immediately prior to the fire I lived with my son who was twelve years old at the time, in a house on a larger property, where we maintained a sense of privacy and comfort. The home had a separate, private entrance; a bedroom; our furniture; and all of our clothes, belongings, and memorabilia. My son and I had our own beds and own rooms. We had one bathroom, a kitchen, extended living space, an outdoor patio, and a backyard. In our monthly rent, water, cable, garbage disposal, and all other utilities were included.

Since the fire, my son and I were forced out of our home with no family or support system nearby. We had nowhere to go, no clothes, shoes, or basic toiletries. We ultimately had no choice but to seek help from my son's paternal grandfather. We stayed on the floor there for the initial seventeen days and borrowed belongings. Thereafter, I found an apartment that is costing me \$700 more a month for a smaller unit with no privacy. I have given the one bed we have to my son and I sleep on the sofa or the floor. We have received some donated plates, cups, and silverware and very limited clothes. As a result of all this immediate and unexpected loss, we are continuously under extreme financial pressure and burden and have difficulty making ends meet. In addition to the increase in our monthly rental payments, I now also pay for all the individual utilities. The financial burden has had a domino effect on my ability to replace our belongings, timely payments, and my credit. The car I used to escape the fires needs repair, but only once our immediate needs are met can I consider that expense. Aside from the livelihood we have lost, my son and I are suffering from the emotional distress of trying to escape the fires unscathed. I have panic attacks and anxiety but cannot afford to seek out treatment or help and my son has been silently coping, but would also benefit from professional guldance and/or counseling.

It is imperative that I receive funds immediately to obtain stable and habitable housing, buy

food, clothes and other basic life necessities, and to just generally get back on my feet.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that if called to do so, would competently so testify. Executed on this day of April, 2019 at Rehiber Park, San Francisco, California.

Tracy Lynne Ambrister

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I, LARA BALAN, make this declaration based on my personal knowledge. I am over the age of 18 and am competent to testify and do so as follows:

- 1. At the time of the Camp Fire on November 8, 2018 I was renting a home in Magalia, California.
- 2. As a result of the Camp Fire my house and all of my possessions were totally destroyed and I lost my place to live.
- 3. At the time of the Camp Fire I did not have any insurance to provide for my home, my personal possessions or additional living expenses.
- 4. Because of the fire my husband and I have had to live in temporary housing and shelters including motels and friends' houses and have finally wound up in a temporary residence in Magalia.
- 5. It is imperative that we receive funding to replace personal possessions, clothing and to be able to find satisfactory housing.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that if called to do so, would competently testify. Executed this 29% day of April, 2019 at Chico, California.

Tara Balar

April 29, 2019

This fire has caused me so many problems that it's almost unreal. I lost 35 years of my life

when this fire took out my home. Like many others, now I have been forced to move away because

of the high cost of new homes in California, especially for the ones near Paradise.

I am on Social Security Disability and have a very limited income. I lost my security that I had

established by purchasing my home. I thought I did a good job making sure I was secure for the rest

of my life and this fire destroyed all that. I knew I could cover my expenses for the rest of my life with

the purchase of this home. That has all changed now.

So many things I had acquired over the years are gone. I have no records of my past life

before the fire. All the tools that I have acquired as an aircraft mechanic and pilot over the years are

gone. My classic Dodge pickup that was fully restored is gone. It took me 20 years to get it in classic

car shape. Educational records, awards, musical instruments, military records, and certifications

vanished.

My health has even suffered from this incident. I have lost 30 pounds from the stress and the

fact that I have been homeless for several months. My relationship with a good lady suffered from all

the stress and not knowing where I was going to live and what I was going to do. I never realized how

much stress could affect the body and emotions until I actually had to experience it for myself.

After the fire, I had no place to go. I temporarily moved in with my son in Texas because I was

tired of living in my car. I have now purchased a home in Texas because I cannot afford to return to

Paradise.

All the friendships I had established have been cast to the four winds. I am having to try and

start over in an area where I know absolutely no one. My son is my closest family and he's still three

hours driving time away from me because of the new cost of living that has been thrust upon me.

I worked very hard to establish my life there in California, and was very happy with the home

and the community that we chose for ourselfs. Starting over at 59 years old really sucks. I will survive

but it's been very difficult. When I learned PG&E started this fire I thought to myself what a total disregard for life and property these people showed towards the local residents of the area. As if we didn't matter.

I am still feeling the effects of what this fire and the people responsible for it have done to my life and I probably will for a long time. I really notice it when I go to repair something and I don't have the tools or materials to do it. Something I used to take for granted. Starting over with nothing but the clothes on you back and the car you escape from the flames in is not a lot. All the lost records,

pictures, possessions and friendships have been my devastating reality.

PG&E should be held responsible for their actions that caused this devastating fire – for all the people who were suddenly made homeless, turning their lives upside down, and destroying their lives and property. I am one of them. Many people were like me on fixed incomes and will never get back what we once had. I would like that security back for us all.

Thank you for your time and consideration in this matter.

Levi M. Durnet

Sincerely,

Kevin Burnett

Camp Fire Survivor

Marshall, Texas

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#### **DECLARATION OF ALEX CRANSTOUN**

I, Alex Cranstoun, make this declaration based upon my personal knowledge. I am over the age of 18, am competent to testify and do so as follows:

At the time of the North Bay Fires I lived in Santa Rosa, California. My primary and only residence was destroyed in the fire. I lost my home, and all of my possessions, and I had no insurance coverage.

Immediately prior to the fire, I lived at 556 Biltmore Street at the Journey's End Mobile Home Park in Santa Rosa, California. I paid the equivalent of \$600.00 each month, which was exchanged by working 24 hours each month for my landlord, Julayne Smithson, at the rate of \$20.00 per hour. The home in which I resided was comfortable and contained everything I owned, including tools and equipment for my then painting business, antique/vintage guitars, clothing, electronics, furniture, artwork, and motorcycles.

Since the fire, I have lived in multiple locations, some of which required me to pay on a daily or weekly basis. A few of these homes belonged to friends who allowed me to stay with them for a couple of weeks at a time, and to which I paid \$50 each week. One of the locations where I stayed after the fire was the home of a woman who contacted me after I made a post on Craiglist inquiring about post-fire housing. I paid her \$100 each week. Paying for rent was difficult to do, as I was uninsured and lost my ability to earn income as a result of losing my painting equipment and tools in the Tubbs Fire. I currently reside at an apartment complex on Tachevah Drive in Santa Rosa, California, where I perform maintenance work in exchange for a 50% discounted rate on rent. I have still not recovered from the loss of my painting business.

It is imperative that I receive funds immediately to obtain stable and habitable housing, buy food, clothes and other basic life necessities, and to just generally get back on my feet.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that if called to do so, would competently so testify. Executed on this 30 day of April, 2019 at Santa Rosa, California.

aley Comm

# DECLARATION OF ROBERT DEWALT

I, Robert DeWalt, make this declaration based upon my personal knowledge. I am over the age of 18, am competent to testify and do so as follows:

At the time of the Camp Fire I lived in Paradise, California. My primary and only residence was destroyed in the fire. My family and I lost our home, and all of our possessions. And we had no insurance.

Immediately prior to the fire I lived at 1429 West Dottie Lane in Paradise, California with my wife Marie and several of our adult children. We lost the double-wide two bedroom, one bathroom home we rented, the one bedroom, one bathroom granny unit, and a fifth wheel trailer that comfortable housed our family on a half-acre lot. We knew we were in trouble by 9:00 a.m. the morning of the fire. Everyone loaded up, and we fled the property by 9:15 a.m. as the fire barreled toward us. Not only did we lose our homes and everything that we owned, we also became stuck in traffic during out evacuation. The flame caught up with us, and we feared for our lives as we moved slowly through a tunnel of fire for nearly an hour as we attempted to get to safety.

Since the fire, my family has been dispersed. My wife Marie and I stayed at my sister's house for a few weeks after the fire, while our children stayed with other family members. On Thanksgiving, Marie and I moved into a travel trailer on a friend's property outside of Chico. On December 29, 2018, we moved our trailer to a permanent RV parking spot in Oroville, where we have been since. Our children continue to bounce around, staying with friends or family that are able to take them in. We have lost the security and comfort that we had created in our home, and our new normal costs us all of our income, with little capacity to look toward the future.

It is imperative that we receive funds immediately to obtain stable and habitable housing, buy food, clothes and other basic life necessities, and to just generally get back on our feet.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that if called to do so, would competently so testify. Executed on this 28th day of April, 2019 at 330 Wall Street, Suite 20, Chico, California.

Robert DeWalt

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#### **DECLARATION OF LEE ANN ESTEP**

I, Lee Ann Estep, make this declaration based upon my personal knowledge. I am over the age of 18, am competent to testify and do so as follows:

At the time of the Camp Fire I lived in Oroville, CA. My primary and only residence was destroyed in the fire. I lost my home, and all of my possessions. And I had no insurance.

Immediately prior to the fire I lived in a house with my three children. It had a nice yard and could accommodate my two dogs and three cats. Everyone had their own room.

Since the fire, I have been living in Oroville. Immediately following my evacuation we stayed in Oroville for about one week in an RV. After moving around for about 3 weeks I found a 5<sup>th</sup> wheel and was able to return with my three kids. The 5<sup>th</sup> wheel is much smaller with much less privacy for everyone. Additionally, one of my sons is autistic and the complete destruction of his surroundings and routine has been devastating. Fortunately, we were able to parked the trailer behind my work, where we have stayed for about 6 months. The 5<sup>th</sup> wheel runs off of a generator which we need to run 24 hours a day and it burns through 5 gallons of gas/day. With gas prices going up this has been extremely challenging.

It is imperative that I receive funds immediately to obtain stable and habitable housing, buy food, clothes and other basic life necessities, and to just generally get back on my feet.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that if called to do so, would competently so testify. Executed on this \_\_\_\_\_\_\_day of April, 2019 at Oroville, California.

LEE ANN

### **DECLARATION OF SIMMON FLAGG**

I, Simon Flagg, make this declaration based upon my personal knowledge. I am over the age of 18, am competent to testify, and do so as follows:

At the time of the Camp Fire I lived in Paradise, California. My primary and only residence was destroyed in the fire. I lost my home, and all of my possessions. And I had no insurance.

Immediately prior to the fire I lived at 5020 Edgewood Lane in Paradise with my fiancé, Cammie Sarmiento, a roommate, and our pets. We rented a three bedroom house on a 20 acre ranch where we lived, and I worked. I operated an art and jewelry design studio in the garage. I am also a certified diver, and all of my equipment was stored at the home.

We fled our home as the fire approached on November 9<sup>th</sup>, 2018. Cammie and I got separated. Cammie was still recovering from pair of back surgeries she had endured about two months earlier, but was able to leave the property before the fire cut off their road. Cut off from the road, I fled on foot down the side of the canyon, across it, and back up the other side.

Since the fire, we lived with a friend in Chico for two weeks, then we moved in with my mother in Forest Ranch of February 1<sup>st</sup>. On February 1<sup>st</sup>, Cammie's mother lent us a fifth wheel trailer that the Paradise City Counsel allowed us to place on the back five acres of our rental property away from the destroyed structures. We pay \$15 a day to run a generator, \$200 each time we need water delivered to fill up our water tank, and on May 1<sup>st</sup>, we will resume paying rent to the property owner.

Cammie's recovery from back surgery was difficult before the fire, but the constant moving, uncomfortable settings, and extra care has been challenging and uncomfortable for us both. She is on disability, and my income stream was destroyed in the fire. I briefly found work on a road crew, only to lose it when PG&E declared bankruptcy. I am dedicating all of my energy that isn't focused on Cammie's recovery and the fire on seeking new employment.

It is imperative that we receive funds immediately to obtain stable and habitable housing, buy food, clothes and other basic life necessities, and to just generally get back on our feet.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that if called to do so, would competently so testify. Executed on this 25th day

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#### **DECLARATION OF JAMES GAEBE**

#### I, JAMES GAEBE, declare:

- 1. I make this declaration based upon my personal knowledge. I am over the age of 18 and am competent to testify with regard to the matters herein.
- 1. At the time of the Camp Fire, I lived in Paradise, California. I rented a home at 5683 Clara Lane, Paradise, CA. My house was destroyed in the fire and I lost my home and all of my possessions. At the time of the fire I was receiving ongoing medical monitoring and testing for Leukemia.
- 2. I had no insurance that provided coverage for the loss of my personal possessions and/or for my additional living expenses. In the immediate aftermath of the fire, I was forced to relocate to Carmichael, California to a condominium, which my wife had been in the process of vacating. My wife was in the process of moving all of her belongings into my home in Paradise, at the time of the fire, because we had just married.
- 3. In December of 2018, my employment terminated because I could not commute to Paradise, California every day. I am currently unemployed and lost my medical benefits, forcing me to pay \$630 a month out of pocket so that I can continue receiving the medical monitoring and testing I need for Leukemia and medical conditions related to it. I am unemployed and I have been unable to find employment. Having to pay for my own medical insurance without income has caused significant hardship.
- 4. It is imperative that I receive the funds necessary to obtain permanent housing, assist with medical and everyday living expenses, and to replace at least some of the furnishings and clothing that I lost.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that if called to do so, would competently so testify. Executed on this 24<sup>th</sup> day of April, 2019 at Sacramento, California.

JAMES GAEBE

#### **DECLARATION OF KATHERINE GAYNOR**

I, Katherine Gaynor, make this declaration based upon my personal knowledge. I am over the age of 18, am competent to testify and do so as follows:

At the time of the North Bay Fires I lived in Santa Rosa, California, My primary residence, as well as a rental home that I owned, were destroyed in the Tubbs Fire. I lost my home, my income, and all of my possessions. I had no insurance coverage on either property.

Immediately prior to the fire, I lived at 3485 Santiago Drive with my husband Larry Gaynor and daughter Ramona Gaynor. We resided in a 1,000 square foot house on an 8,300 square foot lot that was surrounded by mature trees, shrubs and landscaping. We had a brick walkway that led to a patio in our front yard, a deck in our backyard, and a beautiful garden. We had oak trees that we grew from acorns, Asian pear trees, Japanese maple trees, hawthorn trees, and plum trees that provided us with privacy, shade and fruit. We also had 30 mature rose bushes, viburnums grown from seed, pittosporums, Italian buckthorn, and hydrangeas, among various other plants and herbs. We had a 15x25 foot greenhouse, dry stone walls and rocks in our yard, as well as planter boxes and a chicken coop that we built ourselves. As an artist, I spent my days in my 3 bedroom, 1 bathroom home perfecting my craft. My daughter Ramona, a clothing designer, did the same. Our home was full of antiques, including an 18th century rocking chair, and numerous irreplaceable personal items.

Since December 2017, after the fire, I have been living in a FEMA-supplied 2 bedroom, 1 bathroom apartment in Petaluma, California, with my husband and daughter. This FEMA-supplied housing was intended to end on April 10, 2019, but we received an extension to stay until July 2019. Between the beginning of May 2019 and July 2019, FEMA will allow us to remain in our current housing for the amount of \$700 each month; however, there is no guarantee that we will receive another extension to remain in FEMA housing after July 2019, and we will likely be forced to move out of state.

Immediately after our harrowing evacuation, we spent the day at a family friend's

home in Rohnert Park, California. For 2 months following the fire, my family and I lived with my husband's then 92-year old mother in Fairfield, California, in her 2 bedroom condominium. My daughter Ramona and I slept on a daybed together, while my husband Larry slept on the couch in the living room.

My daughter Ramona and I are disabled and, other than working on our art at home when we can, all of which we lost in the fire, we are unable to earn an income. The current FEMA housing does not allow us enough space to work on our crafts, and we are unable to afford the necessary art supplies. The fire and devastation resulting from the fire has caused myself and my family a tremendous amount of stress, which had led to the decline in both the mental and physical health of my entire family. While all of my family is suffering from many ailments as a result of the Tubbs Fire, including suffering from Post-Traumatic Stress Disorder, my husband Larry's Post-Traumatic Stress Disorder has negatively impacted his work, and is causing his land surveying business to fail.

It is imperative that I receive funds immediately to obtain stable and habitable housing, buy food, clothes and other basic life necessities, and to just generally get back on my feet.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that if called to do so, would competently so testify. Executed on this 29th day of April, 2019 at Petaluma, California.

Karlerine A. Gaynor Katherine Gaynor

Chico-

# **DECLARATION OF WILLIAM GOGGIA**

- I, WILLIAM GOGGIA, declare:
- I make this declaration based upon my own personal knowledge. I am over the age of 18 and am competent to testify to the matters stated herein.
- 2. At the time of the Camp Fire I lived at 1457 Carroll Lane, Paradise, California. I owned my home. My home was a 3 bedroom, 2 bath home. I did not have any homeowners insurance.
  - 3. Prior to the fire I suffered a heart attack and I was unable to work.
- 4. My house was destroyed in the Camp Fire and I lost my home and all of my possessions. I also suffered burns in the fire, including a burn to my left eye. I am now blind in my left eye. I am still not able to work.
- 4. Immediately following the fire I was hospitalized at Enloe Medical Center in Chico, California. Over the next several weeks, I was either in the hospital, staying with neighbors, or staying in a trailer. I was able to move in with my aunt in early January of 2019. I have lived with my aunt since that time.
- 5. It is imperative that I receive the funds necessary for daily living, to obtain housing and to replace at least some of the furnishings and clothing, which I lost.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own personal knowledge. Executed on this day of April 2019 at

, X

\_, California.

WILLIAM GOGGIA

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#### **DECLARATION OF KATHLEEN GROSS**

I, Kathleen Gross, make this declaration based upon my personal knowledge. I am over the age of 18, am competent to testify and do so as follows:

At the time of the North Bay Fires I lived in Santa Rosa, California. My primary and only residence was destroyed in the fire. I lost my home, the licensed daycare business that I ran out of my home, and all of my possessions. I had homeowner's insurance coverage through Nationwide, but I was insured for only \$32,000 in additional living expenses ("ALE"), which lasted a mere 16 months after the fire. Since January 2019, my living expenses have not been covered by insurance, and I have been forced to use the minimal funds that I received from Nationwide to rebuild my home to pay for my living expenses.

Immediately prior to the fire, I lived in a 3 bedroom, 2 bathroom home at 1328 Cashew Road in Santa Rosa, California. My home had all new flooring, beautiful artwork and furniture, and was in a community that treated me like family. On my .24 acre lot, I had a 120 square foot shed and 1,400 square foot home, which included an extended playroom for my licensed daycare business. I also had a finished backyard. The entire yard was lined with mature redwood trees and fruit trees, and it also had a shade garden and vegetable garden, which made my home peaceful, comfortable and private. In addition to the trees, gardens, grass area and covered patio in my yard, I had a large bark area with climbers and a swing set, a 50 foot long racetrack, and a sand area containing toys and a playhouse. Not only was my home a gathering place for family and friends, but it was my business and a safe place for children to grow and learn; all of which I lost as result of the Tubbs Fire.

Since the fire, I have lived in two locations. The morning of the fire, after I evacuated from my home, I was also evacuated from a friend's home in Rohnert Park that same day. I was able to stay at a friend's 3 bedroom, 2 bathroom home in Petaluma, California, for 1 week after the fire. At this location, although I knew my friend's wanted to help me, I felt shocked, overwhelmed and like my presence was

intrusive. On October 15, 2017, I was grateful to find a 2 bedroom, 1½ bathroom condominium in Rohnert Park. This location, while conveniently located, costs \$2,000 each month and is not child-friendly. I am not able to continue my childcare business due to the stairs, fireplace and flooring in my condominium, and I do not have funds to rent another location for my business, as I was only insured for business liability, and not for lost income or business personal property.

It is imperative that I receive funds immediately to remain in stable and habitable housing, buy food, clothes and other basic life necessities, and to just generally get back on my feet.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that if called to do so, would competently so testify. Executed on this 29<sup>th</sup> day of April, 2019 at Santa Rosa, California.

Kathlan Luss

1.3

I, JENNIFER GROVE, make this declaration based on my personal knowledge. I am over the age of 18 and am competent to testify and do so as follows:

- 1. At the time of the Camp Fire on November 8, 2018 I was living in Concow, California.
- 2. As a result of the Camp Fire my house and all of my possessions were totally destroyed and lost my place to live.
- 3. At the time of the Camp Fire I did not have any insurance to provide for my home, my personal possessions or additional living expenses. Unfortunately I still owed on a mortgage.
- 4. Because of the fire my husband and I have had to live at the homes of different relatives and have finally wound up in temporary residence in Chico.
- 5. It is imperative that we receive funding to replace personal possessions, clothing and to be able to find satisfactory housing.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that if called to do so, would competently testify. Executed this day of April, 2019 at Chico, California.

JENNIFER GROVE

# DECLARATION OF KENNETH W. GROVE, JR.

- I, KENNETH W. GROVE, JR., make this declaration based on my personal knowledge. I am over the age of 18 and am competent to testify and do so as follows:
- 1. At the time of the Camp Fire on November 8, 2018 I was living in Concow, California.
- 2. As a result of the Camp Fire my house and all of my possessions were totally destroyed and I lost my place to live.
- 3. At the time of the Camp Fire I did not have any insurance to provide for my home, my personal possessions or additional living expenses. Unfortunately I still owed on a mortgage.
- 4. Because of the fire my wife and I have had to live at the homes of different relatives and have finally wound up in temporary residence in Chico.
- 5. It is imperative that we receive funding to replace personal possessions, clothing and to be able to find satisfactory housing.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that if called to do so, would competently testify. Executed this  $29^m$  day of April, 2019 at Chico, California.

Benneth W. GROVE, JR.

2.7

#### **DECLARATION OF ISA JACOBY**

I, Isa Jacoby, make this declaration based upon my personal knowledge. I am over the age of 18, am competent to testify and do so as follows:

At the time of the North Bay Fires, I lived in Glen Ellen, California. My primary and only residence was destroyed in the fire. I lost my home, my catering business, my rental income, and all of my possessions. I had no insurance coverage.

Immediately prior to the fire, I lived at 2775 Cavedale Road in Glen Ellen, California, which was my primary residence, as well as my rental property, and the location where I performed work for my catering business. On my .7 acre property was my 1,200 square foot home with a deck, a 1,000 square foot apartment, a barn, and several sheds. My property, at which I lived for 25 years in the hills of Glen Ellen, had olive trees and a small vineyard, and also had an open view that overlooked the Valley of the Moon to Mt. Tamalpais. I did not have a mortgage on my property, and a young couple with a baby lived in the apartment on my property and paid \$1,000 in rent each month. My livelihood depended on my property, and my home was comfortable, private and stable.

Since the fire, I have been living off and on with my mother in a small townhome located in Sonoma, California, and have also stayed with friends in Sebastopol, California. I am grateful to my mother and friends for allowing me to stay with them but, at those locations, I felt uncomfortable not to have my own space.

FEMA provided me with a lump sum of \$30,000 to \$35,000 in assistance, which I used to purchase a 25-foot trailer for my property. Unfortunately, there were no additional funds for me to utilize to purchase personal possessions or to assist me with my business. Due to the Nuns Fire, I lost all of my business equipment, as well as the space that I used to conduct my catering business. In order to earn an income, I must now rent a kitchen space or only take jobs that have a kitchen available to use. This, in addition to no longer receiving rental income, has caused my work to be sporadic and has significantly lowered my overall earnings.

Temporary power, for which I spent \$5,000 to obtain, was restored to my property in February 2019; however, I still do not have running water. I have a natural spring that I share with a neighbor that I am able to use with a hose, but my trailer does not have a filtration system to rid the spring water of sediment. Therefore, I do not have a working shower or restroom on my property. I have been residing at my property since February 2019, but have been required to travel between my trailer and the residence occupied by my mother in order to shower. The once vast view of green trees and hillsides now appears to be darkened and burnt. Due to the loss of my home and rental income, and the substantial decline in my work and business earnings, my life continues to be a challenge and I feel insecure, anxious and uncertain about what my future holds.

It is imperative that I receive funds immediately to obtain stable and habitable housing, buy food, clothes and other basic life necessities, and to just generally get back on my feet.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that if called to do so, would competently so testify. Executed on this 30<sup>th</sup> day of April, 2019 at Sonoma, California.

Asa Jacoby

Isa Jacoby

2.8

# DECLARATION OF MICHAEL KRZANICH

I, MICHAEL KRZANICH, make this declaration based on my personal knowledge. I am over the age of 18 and am competent to testify and do so as follows:

- 1. On November 8, 2018 at the time of the Camp Fire I rented a house in Magalia, California. My home was destroyed in the fire and I lost all of my personal possessions.
- 2. I had no insurance which provided coverage for this loss of my possessions and my additional living expenses.
- 3. Since the fire I have been forced to live in temporary housing and shelters including motels, friends' houses, couches and all together more than six different places and now I have found only temporary housing with a friend in Magalia, California.
- 4. It is imperative that I receive the funds necessary to obtain more permanent housing and to replace at least some of the furnishings and clothing which I lost.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that if called to do so, would competently testify. Executed this  $\ensuremath{\ 29}\$  day of April, 2019 at Chico, California.

MICHAEL KRZANICH

#### **DECLARATION OF DAWN LAZZARINO**

I, DAWN LAZZARINO, make this declaration based upon my personal knowledge. I am over the age of 18, am competent to testify and do so as follows:

At the time of the Camp Fire I lived in Magalia California. My primary and only residence was destroyed in the fire. I lost my home, and all of my possessions. And I had no insurance.

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Immediately prior to the fire I lived my husband and I were living in a 3 bedroom house with 2 full bathrooms, a single car garage, 2 storage sheds, and an outside deck.

Since the fire, I have been living in numerous locations. Motels were all reserved when we finally were able to get out of the fire zone so we had to stay at a martial arts studio for the first night. We then went to a friend's motel for showers and we were able to get our own room for two nights, but ran out of money so we stayed with an uncle for a month in one of his rooms. Then we stayed in another family member's trailer on uncle's property for about 2-3 months. We contacted FEMA and were hoping to be provided with a trailer. We have 5 dogs and about 23 rescue birds. FEMA informed us that it would be very hard to find a trailer with all of the animals. In the meantime we were given some money from FEMA. We were able to find and buy our own trailer and have been staying on our uncle's property. Our animals had to be separated and were sent to a rescue center. We were not even able to see them while they were there. We spend every day wondering how long we will be able to stay here. I also have PTSD and my doctors have struggled to find a medication to ease my PTSD.

It is imperative that I receive funds immediately to obtain stable and habitable housing, buy food, clothes and other basic life necessities, and to just generally get back on my feet.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that if called to do so, would competently so testify. Executed on this \_\_\_\_\_ day of May, 2019 at \_\_\_\_\_ Chico, California.

DAWN LAZZARINO Z CAS ZOM (A)

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Dario de Ghetaldi - Bar No. 126782
 1
     Amanda L. Riddle - Bar No. 215221
     Steven M. Berki – Bar No. 245426
 2
     Sumble Manzoor - Bar No. 301704
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15
     Attorneys for Individual Butte Fire, North Bay Fires,
     And Camp Fire Victim Claimants
16
                             UNITED STATES BANKRUPTCY COURT
17
                             NORTHERN DISTRICT OF CALIFORNIA
18
     In re
                                                  Case No. 19-30088-DM
19
                                                  Chapter 11
     PG&E CORPORATION and
20
     PACIFIC GAS AND ELECTRIC
                                                  (Joint Administration Pending)
     COMPANY,
21
                                                  DECLARATION OF JANET LUCICH IN
                     Debtors.
                                                  SUPPORT OF WILDFIRE VICTIMS
22
                                                  HOUSING FUND
23
24
           I, Janet Lucich, declare as follows:
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                  I am a plaintiff in a lawsuit against the Debtors filed in the Superior Court of
           1.
26
     California, County of San Francisco, Case number CGC-15-549629.
27
28
                                   DECLARATION OF JANET LUCICH
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- 2. At the time of the Butte Fire, and on September 9, 2015, I resided at my home located at 8240 Maranatha Lane, Mokelumne Hill, CA 95245, along with my husband.
- 3. As a result of the Butte Fire on or about September 9, 2015, my two-bedroom, two-bathroom, 1,300-square foot residence, multiple outbuildings, and personal property were destroyed in the fire. Many of our animals and livestock perished in the fire. All 39.52 acres of our property were burned and severely damaged.
- 4. At the time of the Butte Fire, I did not have a policy of insurance which covered either my residence, land, contents, or additional living expenses.
- 5. During the fire I feared that my husband and two sons had died while fleeing the flames on foot.
- 6. Following the fire my husband lived in his rental car for approximately three months until we were finally able to secure a trailer as temporary housing. For more than three years following the fire, my husband and I have been living in a fifth wheel trailer on our burned land. We have no electricity except that produced by a small generator. We have limited access to running water and heat.
- 7. My husband and I do not have the funds to rebuild our house or restore our property, and we cannot do so until we are compensated by the Debtors.
- 8. I attended multiple pre-petition mediations with the Debtors and my case was not resolved.
- 9. I understand this Court approved the Debtors plan to pay \$235,000,000 in bonuses to approximately 10,000 of its employees, while many wildfire victims, including myself, remain homeless.
- I, Janet Lucich, hereby declare under penalty of perjury of the laws of the State of California that I have read the foregoing Declaration and know its contents. The same is true of my own personal knowledge, except for those matters stated on information and belief which I believe to be true. If called to testify as a witness, I could do so competently.

Executed on April 29, 2019 at +0/50m, California

By: Janet Lucich

-3-DECLARATION OF JANET LUCICH